

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

IN THE MATTER OF THE APPLICATION
OF THE UNITED STATES OF AMERICA
FOR A WARRANT AUTHORIZING THE
SEARCH OF 8747 EAST FARM ROAD 186,
ROGERSVILLE, MISSOURI, 65742

No. 21-SW-2153DPR
(UNDER SEAL)

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

1. I, Kelsey L. Cliffe, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

2. This Affidavit is offered in support of an application for the issuance of a search warrant to search 8747 East Farm Road 186, Rogersville, Missouri, 65742 (TARGET LOCATION), located within the Western District of Missouri.

3. Based on the investigation to date, I have probable cause to believe that Evan Marshall (MARSHALL) has engaged in, and continues to engage in, the following activities, in violation of federal law, either as an individual violating the law or conspiring with others to do so, including violations of 18 U.S.C. § 2314 (interstate transportation of stolen property); § 371 (conspiracy); § 1956 (money laundering); § 1956(h) (conspiracy to commit money laundering); and § 1957 (engaging in monetary transactions of a value greater than \$10,000 in property derived from specific unlawful activity).

II. BACKGROUND OF THE AFFIANT

4. I am a Special Agent (SA) with United States Immigration and Customs Enforcement (ICE) Office of Homeland Security Investigations (HSI) in Springfield, Missouri. I have been employed with ICE/HSI since August 2020. I have been employed in the field of law enforcement since June 2016, including duties as a police officer, detective, and corporal in Ozark,

Missouri. I have attended various training academies, including the Federal Law Enforcement Training Center's Criminal Investigator Program and the Immigration and Customs Enforcement Special Agent Training. I am a federal law enforcement officer as defined in Rule 41 of the Federal Rules of Criminal Procedure and I am authorized by federal law to request a search warrant.

5. As part of my duties with ICE/HSI, I investigate criminal violations relating to 18 U.S.C. § 2314 (interstate transportation of stolen property); § 371 (conspiracy); § 1956 (money laundering); § 1956(h) (conspiracy to commit money laundering); and § 1957 (engaging in monetary transactions of a value greater than \$10,000 in property derived from specific unlawful activity).

6. The statements in this affidavit are based on personal observations, training and experience, investigation of this matter, and information obtained from other agents/police officers and witnesses. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included every fact known to me concerning this investigation. I have set forth the facts necessary to establish probable cause to believe that evidence, fruits, and instrumentalities of violations of 18 U.S.C. §§ 2314, 371, 1956, 1956(h) and 1957 are currently located at 8747 E. Farm Rd 186, Rogersville, Missouri, 65742 which is in the Western District of Missouri, further described in Attachment A.

7. This affidavit is in support of an application for a search warrant for the TARGET LOCATION for evidence, fruits, and instrumentalities of the forgoing criminal violations. The TARGET LOCATION to be searched is described in Attachment A. I request the authority to search and/or examine the seized items, specified in Attachment B, as instrumentalities, fruits, and evidence of crime.

8. As described in this affidavit, I have probable cause to believe that evidence of

violations of 18 U.S.C. §§ 2314, 371, 1956, 1956(h), and 1957, is located, and within the TARGET LOCATION.

III. PROBABLE CAUSE IN SUPPORT OF THE WARRANT

A. INVESTIGATION BACKGROUND

9. A catalytic converter is an exhaust emission control device that reduces the amount of toxic gas produced by motor vehicles. Catalytic converters were mandated for all cars and trucks since 1975. Catalytic converters are located underneath the vehicle near the engine exhaust manifold. Catalytic converters contain metals like platinum, palladium, and rhodium. Used catalytic converters are taken to recycling businesses where the metals are removed and resold. In 2021, a gram of palladium sold for as much as \$77, an ounce sold for as much as \$2,415, and a kilogram of palladium sold for as much as \$77,663 according to the Live Metal Spot website. A thief can receive \$500 for one stolen catalytic converter in Springfield, Missouri. The average cost to replace a catalytic converter is approximately \$1,000.

10. Beginning in the fall of 2019, the Springfield, Missouri, Police Department (SPD) observed an alarming trend in thefts of catalytic converters from vehicles in the Springfield, Missouri, metropolitan area ("Springfield metropolitan area"). Between December 11, 2019, through February 23, 2020, 220 catalytic converters were stolen from parked vehicles in the Springfield metropolitan area. This was a marked increase from the previous year. According to SPD, in 2019 there were a total of 90 catalytic converters stolen in Springfield.

11. The community impact on the Springfield metropolitan area is significant. Life 360 Community Services is a non-profit organization based in Springfield, Missouri, that is responsible for feeding over 15,000 children in Southwest Missouri. Catalytic converters were stolen from six of the organization's vans in November 2020. Another non-profit organization, the Kitchen, had

three catalytic converters stolen in 2020. The Salvation Army, Habitat for Humanity, and churches have all been victims of catalytic converter thefts in the Springfield metropolitan area. These thefts have resulted in interruption and loss of community services in the area. Since October 2020, SPD indicates that victims have lost approximately \$400,000 due to thefts of the catalytic converters. The non-profit organizations lost at least \$120,000 from thefts.

12. Evan MARSHALL was identified as the owner of A&E CORES LLC ("A&E CORES"). Cameron DAVIS was an employee and associate of MARSHALL. According to the Missouri Secretary of State's records, A&E CORES was incorporated on December 11, 2019, with MARSHALL being the owner, and its principal office address is 8747 East Farm Road 186, Rogersville, Missouri 65742 (the TARGET LOCATION). Prior to December 11, 2019, the average number of catalytic converter thefts in the Springfield metropolitan area was less than six per month. After A&E CORES opened, there has been a significant increase in the number of stolen catalytic converter thefts in the Springfield metropolitan area.

13. As explained below, investigators learned that A&E CORES, through MARSHALL, was the primary business that bought the stolen catalytic converters.

B. STOLEN CATALYTIC CONVERTERS SOLD TO MARSHALL AT TARGET LOCATION AND ELSEWHERE

14. SPD has arrested several subjects over the past 21 months, including but not limited to Dickie REA, Kenneth SMITH, Martin MORRIS, and Kyle DAKE. These four subjects were all arrested with stolen catalytic converters. These four subjects also have previous arrests for methamphetamine possession and stealing.

15. On February 12, 2020, SPD arrested Dickie REA. A search on REA's phone revealed that he was communicating with MARSHALL. REA would text MARSHALL in the morning with the types of catalytic converters that REA had stolen overnight.

16. On February 23, 2020, SPD arrested Kenneth SMITH for stealing catalytic converters. Following his arrest, SPD officers executed a search warrant on SMITH's cell phone. A search of SMITH's cell phone revealed that SMITH was selling stolen catalytic converters to someone named "Catco Joe." Through further investigation, SPD officers determined that Catco Joe is an alias for Cameron DAVIS. A Facebook business card listed DAVIS as an A&E CORES employee.

17. On March 6, 2020, SPD arrested Martin MORRIS for stealing catalytic converters. In a post-Miranda interview, MORRIS stated that he was selling stolen catalytic converters to MARSHALL and DAVIS. MORRIS stated that MARSHALL and DAVIS knew the catalytic converters were stolen.

18. In July 2020, SPD identified Kyle DAKE as a prominent catalytic converter thief in the Springfield metropolitan area. Around July of 2020, SPD Detective Justin Thorn contacted both MARSHALL and DAVIS via telephone. Detective Thorn utilized the phone numbers listed on MARSHALL's and DAVIS' A&E CORES' business cards in order to establish contact. MARSHALL's phone number was 417-812-4792 and DAVIS' phone number was 417-720-5774. MARSHALL and DAVIS initially agreed to help in the investigation. MARSHALL and DAVIS stated that DAKE had recently sold them a catalytic converter that matched the description of a stolen catalytic converter that was reported to SPD.

19. During Detective Thorn's July 2020 discussion with MARSHALL and DAVIS, Detective Thorn told MARSHALL and DAVIS not to buy catalytic converters from REA, MORRIS, DAKE, and SMITH.

20. DAKE was ultimately charged with the felony theft of 10 catalytic converters in a Greene County, Missouri, Circuit Court. DAKE had been wearing a court-ordered GPS ankle

monitor during these thefts of catalytic converters. Detective Thorn reviewed the GPS data and it revealed that DAKE had traveled to the TARGET LOCATION near the dates of the reported catalytic converter thefts, to include, but not limited to, July 10, 2020, at 3:41 p.m., July 23, 2020, at 7:44 p.m., and August 1, 2020 at 7:08 p.m. DAKE admitted to Detective Thorn during a post-Miranda interview on August 4, 2020, that he stole two catalytic converters from the Life 360 Church, located at 2220 West Chesterfield Boulevard, Springfield, Missouri. And further that he sold the stolen catalytic converters to "Evan MARSHALL" in "Rogersville."

21. On October 31, 2020, SPD responded to the reported catalytic converter theft from an RV in Springfield, Missouri. Upon arrival, SPD located a cellular telephone underneath the targeted RV. After obtaining a search warrant for the cellular telephone, SPD investigators searched the phone and found that it belonged to REA. Officers discovered numerous text messages between REA and MARSHALL, utilizing phone number 1-417-812-4792. The text messages showed the message partner was "Evan," which is MARSHALL's first name. The following are a sample of the conversations:

- On September 26, 2020, at 2:07 p.m. and 2:08 p.m., REA sent MARSHALL three images of a catalytic converter attached to the undercarriage of a vehicle.
- At 2:10 p.m., MARSHALL responded, *"Yeah those are definitely aftermarket sorry buddy."* REA responded, *"Damn it man it's cool I'll work something out and get ahold of you."* MARSHALL responded, *"Thank U."*
- The following morning, on September 27, 2020, REA sent another text message to MARSHALL which read, *"Hey bro call me when u get up."* Immediately thereafter, REA sent a message to an unidentified person stating, *"Hey man how would u feel about helping me with a ride to [Rogersville] to pick up some money,"* telling the person *"I will [probably] be able to pay u the money I owe u and get one too."* MARSHALL's business, A&E CORES, is in Rogersville, Missouri.
- On September 27, 2020, at 8:56 a.m., REA sent MARSHALL a message which read, *"3369 S. Ridgecrest Ave. and he can call me at this number or 417-209-9551."* REA said, *"He's been here b4 but yea try n see what that's worth f81d ab."* (Upon conducting a Google search for the part number which REA provided in the previous text message, SPD Detective Dan Rankey determined it was associated with a catalytic converter for a Ford vehicle. Utilizing SPD resources, investigators

determined that during the overnight hours, between September 26 and 27, 2020, SPD received multiple reports concerning catalytic converters thefts from five Ford vehicles.)

- At 9:03 a.m., REA sent a text message to a subject named "Mike," utilizing phone number 1-386-268-4659. Investigators reviewed SPD resources and determined this number was associated with Michael WERNEKE. Investigators later determined that WERNEKE worked for MARSHALL and DAVIS, purchasing catalytic converters in the field for A&E CORES. In his text message to WERNEKE, REA stated, *"Hey this is me just give me a call."* WERNEKE responded, *"This is me who? Sorry."*
- At 9:10 a.m., WERNEKE responded, *"yeah I'll be there in a little while ok."* REA then texted the unidentified person he attempted to solicit a ride from earlier, stating, *"Nevermind dude is bringing me the money."*
- At 9:20 a.m., WERNEKE said, *"On my way."* REA asked, *"Bout how long do u think? My step-dad is being a private I don't know how long I can b here."* REA then asked, *"O it's dickie did Evan get ahold of you."*
- Later that day, REA texted MARSHALL once again, stating, *"Hey bro."* MARSHALL responded, *"Whats up."* REA asked, *"Did u get a actual price on that or is that 465 bottom dollar,"* adding, *"Crossing my fingers."* MARSHALL responded, *"That all I've got for the moment buddy. He said he's gonna let me know if he gets more out of it but that'll be Tuesday before I know."*

22. On January 7, 2021, SPD arrested Confidential Source 4 (CS4) for catalytic converter theft. In a post-*Miranda* interview, CS4 stated that MARSHALL was the primary person in the region purchasing catalytic converters. CS4 has been proven reliable and credible. CS4 stated he/she was present when MARSHALL purchased stolen catalytic converters from other individuals. CS4 stated that he/she heard those other individuals tell MARSHALL that they had been caught stealing the catalytic converters they were selling to MARSHALL. According to CS4, MARSHALL would still purchase the catalytic converters, even though he/she knew they were stolen. CS4 stated that MARSHALL would carry large amounts of U.S. currency on his person so that MARSHALL could purchase stolen catalytic converters anytime, night or day. CS4 said that MARSHALL carried a firearm for protection. According to CS4, MARSHALL possesses

automatic weapons at the TARGET LOCATION. During his interview, CS4 positively identified photos of MARSHALL and DAVIS.

23. In January 2021, SPD conducted an interview with Tyler BOHNSTEDT. BOHNSTEDT was a subject involved in repeated thefts of catalytic converters in the Springfield metropolitan area. BOHNSTEDT admitted to selling catalytic converters to MARSHALL and DAVIS on 10 occasions. BOHNSTEDT explained that he sold catalytic converters to MARSHALL instead of scrap yards because the scrap yards paid \$20 to \$40 per catalytic converter, whereas MARSHALL paid him \$100 for a catalytic converter. To determine how much more MARSHALL was paying for catalytic converters than local scrap yards, SPD asked BOHNSTEDT how much a local scrap yard would pay for a catalytic converter valued at \$500 versus how much MARSHALL would pay for the same catalytic converter. BOHNSTEDT stated that if a catalytic converter was valued at \$500, a scrap yard would pay a set price of approximately \$40 to \$50. However, MARSHALL would likely pay \$250 for a catalytic converter valued at \$500.

24. On January 19, 2021, SPD Detective Rankey met with CS4 for a second interview. CS4 advised that MARSHALL transported catalytic converters to Arkansas once or twice a month to sell to a business called CAT DADDIES. CS4 advised that MARSHALL and DAVIS were always in possession of firearms given the amount of currency that they had in their possession at any given time. CS4 stated that MARSHALL was in possession of a large cache of weapons at the TARGET LOCATION, including automatic assault rifles. Further, CS4 admitted to knowing BOHNSTEDT and knowing that BOHNSTEDT was a local catalytic converter thief. CS4 stated that BOHNSTEDT would steal \$800 to \$1,000 worth of catalytic converters per night and then sell them to MARSHALL.

25. On March 11, 2021, members of SPD met with Webster County Sheriff's Office Detective Shane Forrest. Rogersville, Missouri, is located on the county line between Greene County and Webster County, Missouri. Detective Forrest stated that most of his interviews with suspects who steal catalytic converters indicate that the stolen catalytic converters are sold to A&E CORES at the TARGET LOCATION. Detective Forrest indicated that he had a cooperating defendant, Confidential Source 1 (CS1) who would be willing to speak with the SPD detectives.

26. CS1 indicated that he/she and Confidential Source 2 (CS2) had had been stealing catalytic converters for over one year and that they sold the stolen catalytic converters to MARSHALL at A&E CORES at the TARGET LOCATION. CS1 stated, "MARSHALL definitely knew the catalytic converters were stolen." CS1 has been proven reliable and credible to law enforcement based upon previous interviews and corroboration of facts. According to CS1, MARSHALL told CS2 which catalytic converters were most desirable and valuable and to "not work in the Rogersville area." CS1 stated that he/she was with MARSHALL when MARSHALL was in possession of at least \$30,000 in U.S. currency. According to CS1, MARSHALL would pay 60% of the catalytic converter's value. CS1 told investigators that MARSHALL also sold used cars and accepted stolen catalytic converters as payment. According to CS1, MARSHALL also indicated that he would accept stolen side-by-sides, four wheelers, and vehicles. CS1 stated that MARSHALL obtained part ownership in Dan's Automotive. MARSHALL purchased the business because MARSHALL had too much money on hand and needed to "shelter" his currency and profits. CS1 stated that he/she conducted multiple stolen catalytic converter transactions at Dan's Automotive with MARSHALL. CS1 indicated that he/she conducted both cash and CashApp transactions with MARSHALL for stolen catalytic converters.

27. Investigators identified MARSHALL's CashApp account name as "\$AandEcores." CS1 provided SPD Detective Rankey with screen shots of his/her CashApp transactions with MARSHALL since November 2020 that totaled more than \$4,000. CS1 stated that he/she and had earned nearly \$20,000 since November 2020, selling stolen catalytic converters to MARSHALL. CS1 stated that they used the money to pay off debt and to support CS2's narcotic habit. CS1 provided the telephone number for MARSHALL, which was the same telephone number investigators previously identified as belonging to MARSHALL (417-812-4792). CS1 stated that A&E CORES was "far reaching" and that subjects came from as far away as Bolivar and Lebanon, Missouri. CS1 stated that prior to removing a catalytic converter from a vehicle, he/she would often photograph the catalytic converter, text the photo to MARSHALL, and then wait for MARSHALL to respond. If MARSHALL stated that the catalytic converter was good, then CS2 and CS1 would steal the catalytic converter and sell it to MARSHALL.

28. In addition to MARSHALL's part ownership of Dan's Automotive, according to the records from the Missouri Secretary of State, MARSHALL filed Articles of Organization for MARSHALL'S AUTO SALES, LLC, (MARSHALL AUTO SALES) on September 2, 2019. MARSHALL'S AUTO SALES is located at 113 Endeavor Drive, Rogersville, Missouri. Agents were able to confirm with the Missouri State Highway Patrol that MARSHALL'S AUTO SALES had conducted 6 automobile sales between January 4, 2021 and June 10, 2021.

29. On March 23, 2021, SPD Detective Rankey interviewed CS2 regarding his/her knowledge of stolen catalytic converters in the area. CS2 has been proven reliable and credible to law enforcement based upon previous interviews and corroboration of facts. CS2 stated that he/she had been involved in stealing catalytic converters in the past. CS2 advised that he/she was involved in the theft of catalytic converters for some time and routinely sold stolen converters to

MARSHALL. CS2 stated that MARSHALL was also known as the “Boss” and that MARSHALL knew that the catalytic converters that he purchased were stolen. CS2 had direct knowledge that MARSHALL employed a “crew” of thieves and sent them into the community and directed them to specific locations and vehicles to steal catalytic converters from, including car lots. CS2 stated that “tweakers” would simply work all night cutting converters to sell to MARSHALL. CS2 stated that MARSHALL was part owner of Dan’s Automotive and that MARSHALL bought the business to conceal his criminal activity. CS2 stated that MARSHALL paid 60% of the value of the catalytic converters. CS2 estimated that 80% of the converters that MARSHALL purchased were stolen. CS2 indicated he/she had direct knowledge that MARSHALL also purchases stolen vehicles and transports them away from LOCATION ONE. According to CS2, MARSHALL purchased six to eight stolen vehicles per week. MARSHALL also “parts out” the stolen vehicles. CS2 estimated that MARSHALL had approximately 30 people working for him, stealing catalytic converters in the Springfield metropolitan area. CS2 stated that MARSHALL recently purchased a stolen Denali SUV for \$800. During the period CS2 associated with MARSHALL, he/she said he/she observed MARSHALL carrying an assault rifle, that looked like an M-16, with a 30-round magazine. CS2 stated that he/she purchased a vehicle from MARSHALL and was provided a bill of sale. CS2 stated that he/she was later stopped and arrested in the vehicle shortly after acquiring the vehicle from MARSHALL because it was reported stolen.

30. It was determined that CS2 was arrested by the Greene County, Missouri, Sheriff’s Office (GCSO) while operating a stolen Ford F-350 on February 20, 2021. During a post-Miranda interview CS2 advised Greene County Deputy Dustin Kendrick that he/she “purchased the truck from [his/her] boss, Evan MARSHALL.” He/she stated, “Evan owned ‘Auto Sales LLC.’ and had informed [CS2] that he had ensured the vehicle was not stolen before selling it.”

31. On June 1, 2021, SPD Detective Rankey investigated Enx KHOSHABA regarding the theft of catalytic converters in Springfield, Missouri. Detective Rankey was contacted by GCSO Detective Kyle Feldmann. Detective Feldmann advised that GCSO was also investigating KHOSHABA. When interviewed by investigators, KHOSHABA denied that he was stealing catalytic converters, but said people would bring them to KHOSHABA and he would, in turn, sell them to Cody RYDER. According to KHOSHABA, RYDER worked for MARSHALL. KHOSHABA stated that MARSHALL would transport the stolen catalytic converters to Arkansas. Investigators conducted toll analysis on RYDER's cellular telephone number. Investigators determined that there were 452 contacts between RYDER and MARSHALL and/or DAVIS between March 17, 2021, and May 17, 2021.

32. On June 2, 2021, KHOSHABA was arrested by SPD Detective Rankey for stealing catalytic converters. KHOSHABA, post-Miranda, explained how he stole catalytic converters. KHOSHABA stated that he learned how to steal catalytic converters from a subject named "Dallas." According to KHOSHABA, Dallas introduced KHOSHABA to RYDER. KHOSHABA stated that RYDER then introduced KHOSHABA to MARSHALL. KHOSHABA stated that there were "piles" of stolen catalytic converters at the TARGET LOCATION. According to KHOSHABA, the stolen catalytic converters were ultimately taken to Arkansas to be sold. KHOSHABA indicated that he had been involved in the theft of over 60 catalytic converters over the previous two months. KHOSHABA stated that Dallas was a "bad heroin user." KHOSHABA stated that Dallas had to make money and turned to stealing catalytic converters. KHOSHABA stated that Dallas and RYDER had a falling out over drugs so KHOSHABA began dealing directly with RYDER. KHOSHABA stated that he would take the stolen catalytic converters to RYDER'S residence at 2074 North Oakland Avenue, Springfield, Missouri. According to KHOSHABA, he

and RYDER began to ride around Springfield together, identifying vehicles to target to steal catalytic converters. KHOSHABA agreed that RYDER was providing him with a "shopping list" for catalytic converters. KHOSHABA stated that RYDER and MARSHALL were best friends and that RYDER worked for MARSHALL.

33. According to KHOSHABA, RYDER informed him that if KHOSHABA could steal ATV's that RYDER would buy them. On one occasion, RYDER was out of town and KHOSHABA had a stolen catalytic converter. Nathan MARTIN, KHOSHABA's brother, introduced him to MARSHALL again. KHOSHABA and MARTIN drove to a Kum N Go gas station located at 4996 Missouri 125 Highway, Rogersville, Missouri. MARTIN sold KHOSHABA's stolen catalytic converters to MARSHALL for \$1,200. Of the \$1,200 MARTIN received from MARSHALL for the stolen catalytic converters, KHOSHABA received \$600. KHOSHABA stated that MARTIN had a bad heroin problem, indicating that it was likely the money MARTIN received from selling the stolen catalytic converter was used to later purchase heroin.

34. After this transaction, KHOSHABA stole multiple catalytic converters and could not reach RYDER to sell them. KHOSHABA contacted MARTIN who then contacted MARSHALL. MARSHALL instructed them to meet him at the racetrack in Springfield, Missouri. Upon arrival, KHOSHABA observed MARSHALL and RYDER together. It was at that time that RYDER disclosed to KHOSHABA that MARSHALL was RYDER's boss. KHOSHABA subsequently sold four stolen catalytic converters to MARSHALL for \$1,700. Detective Rankey asked KHOSHABA whether MARSHALL knew the catalytic converters were stolen. KHOSHABA responded, "Obviously, you have to think, you have to have some sort of inkling that they're, these, very well are stolen because, if a guy brings you five catalytic converters, let's

say, I'm a buyer and you're bringing me converters. What guy do you know that's going to go rip five catalytic converters off of his cars, and bring them to you and sell them consistently?" KHOSHABA stated, "Common sense would say that you would think they were stolen." KHOSHABA indicated that the fact that the same people were selling catalytic converters to MARSHALL on a regular basis was evidence that MARSHALL knew the catalytic converters were stolen.

35. MARSHALL subsequently gave his cellular telephone number to KHOSHABA. Approximately one week later, KHOSHABA traveled to the TARGET LOCATION to sell stolen catalytic converters. KHOSHABA stated that he sold four or five stolen catalytic converters to MARSHALL for \$1,000. KHOSHABA stated that MARSHALL utilized an app on his phone to determine the price of each catalytic converter. According to KHOSHABA, the app came from the business MARSHALL sells the stolen catalytic converters to in Arkansas. KHOSHABA stated that MARSHALL stores the catalytic converters at the TARGET LOCATION until it is time to sell them in Arkansas. KHOSHABA estimated that there are at least 300 catalytic converters at the TARGET LOCATION at any one time. KHOSHABA stated that RYDER stores his stolen converters at his house before transporting them to the TARGET LOCATION. KHOSHABA stated that both RYDER and MARSHALL carry cash on them to purchase the stolen catalytic converters. KHOSHABA stated that he observed RYDER in possession of at least \$50,000 on one occasion.

36. Detective Rankey asked KHOSHABA if MARSHALL requested any type of identification or provided a receipt for the sale of the catalytic converters. KHOSHABA stated that MARSHALL never asked for KHOSHABA's identification or provided KHOSHABA with a receipt. KHOSHABA stated that he would receive 20% of the value of the catalytic converters that

he sold to MARSHALL, so if the catalytic converters were worth \$1,000, then MARSHALL would pay KHOSHABA \$200. KHOSHABA was asked about taking the catalytic converters to a scrap yard instead of MARSHALL. When asked why KHOSHABA did not sell the stolen catalytic converters to another scrap yard, KHOSHABA stated, "Yeah, I mean, they're going to ask for identification sometimes." KHOSHABA proceeded to say that he would not go to the same scrap yard every day with a stolen catalytic converter because the scrap yard would suspect the catalytic converters were stolen and would not buy them.

37. KHOSHABA told Detective Rankey that thieves know that the police regularly speak with scrap yards about stolen catalytic converters. According to KHOSHABA, RYDER told KHOSHABA that KHOSHABA did not have to worry about that with them. KHOSHABA stated that RYDER told KHOSHABA that police often questioned MARSHALL and his employees about stolen catalytic converters. KHOSHABA recounted RYDER telling him, "They want to know if we was doing this, we done that, we seen this, we seen that," and how RYDER would simply tell the police, "We ain't bought nothing in two weeks." KHOSHABA stated that he had been to the TARGET LOCATION at least twice. Of the 60 catalytic converters KHOSHABA stole, KHOSHABA estimated that he had sold 20 to 25 of them directly to MARSHALL. If MARSHALL could not meet KHOSHABA, MARSHALL would send somebody else to meet KHOSHABA and complete the transaction. KHOSHABA admitted to stealing catalytic converters and taking them to MARSHALL. KHOSHABA admitted to using the money he received from MARSHALL to support his methamphetamine habit. KHOSHABA is on probation through the State of Missouri for drug possession and burglary.

38. On September 23, 2021, Det. Rankey and members of SPD and HSI again interviewed CS4. CS4 stated that during one of his sales of stolen catalytic converters to

MARSHALL that MARSHALL directed him/her how to conceal the fact that catalytic converters were stolen. MARSHALL directed CS4 to re-cut the converters so police could not match the cut marks back up with the vehicle they were removed from. Further, CS4 stated that MARSHALL uses an "app" to look up prices of the catalytic converters. CS4 stated that MARSHALL is the only person to have this "app" and that the "app" was provided to MARSHALL by "the refinery guy". CS4 further stated that MARSHALL may have 15-20 vehicles show up to the TARGET LOCATION, in a four-hour period, with stolen catalytic converters. CS4 stated that he/she would recognize some of the subjects and CS4 knew they were thieves. CS4 stated that RYDER would help MARSHALL with the loading of the catalytic converters from a barn located at the TARGET LOCATION. In addition, MARSHALL boasted to CS4 that MARSHALL made "\$180,000 per week" from the sale of catalytic converters. CS4 stated that he/she assisted MARSHALL in moving a safe into the bedroom of the residence located at the TARGET LOCATION. CS4 assumed MARSHALL would store guns and money in the safe. CS4 stated that MARSHALL routinely carries \$10,000 on his person at any time. CS4 stated that MARSHALL has more money in the house. CS4 also stated that MARSHALL has guns such as AR-15s and pistols inside the house at the TARGET LOCATION.

39. Throughout the course of this investigation, investigators have conducted numerous post arrest interviews and confidential source debriefings concerning the activities of MARSHALL involving weapons. Investigators have learned that MARSHALL carries weapons on him, and in his vehicle, to protect himself because MARSHALL always carries large amounts of cash to pay individuals who steal catalytic converters. As recently as October 12, 2021, MARSHALL advised CS4 that he has approximately 60 guns in his residence and that MARSHALL could use various types of ammunition for his weapons.

C. UNDERCOVER SALES TO MARSHALL

40. From June 14, 2021, to July 13, 2021, an HSI Undercover Operative, UCA-SA-3233 was in conversations with MARSHALL on MARSHALL's cell phone number 417-812-4792. During this time MARSHALL told UCA-SA-3233 that there were a lot of money to be made in "CATS", but it was easier to talk in person than on the phone. MARSHALL texted UCA-SA-3233 a list of vehicle years and models and the approximate value of the catalytic converters for each. UCA-SA-3233 was supposed to meet MARSHALL on July 2, 2021, to sell MARSHALL some catalytic converters. On July 2, 2021, MARSHALL did not make the meeting and did not answer his phone.

41. On July 5, 2021, MARSHALL texted UCA-SA-3233 that he had been sick for several days and he had "graded out almost 1000 converters trying to get ready to ship a load off". On July 12, 2021, UCA-SA-3233 texted MARSHALL to arrange a meeting to sell MARSHALL catalytic converters. At approximately 2:19 pm, MARSHALL met UCA-SA-3233 in the parking lot of the Kum & Go gas station located at 4996 Highway 125, Rogersville, Missouri. MARSHALL arrived driving a Polaris Utility Terrain Vehicle (UTV). MARSHALL asked UCA-SA-3233 if UCA-SA-3233 had heard of MARSHALL through CI3. UCA-SA-3233 confirmed that this was correct. UCA-SA-3233 showed MARSHALL three catalytic converters in the back of UCA-SA-3233's vehicle. MARSHALL looked at the numbers on the catalytic converters, typed the numbers into his phone, and then explained to UCA-SA-3233 what he would pay for each catalytic converter. In discussing how UCA-SA-3233 came into possession of the catalytic converters, UCA-SA-3233 explained that he/she works out of town and in different states and picks up some catalytic converters before leaving an area. MARSHALL laughed and said, "you don't shit where you eat." Then, MARSHALL walked to the Polaris UTV and opened a bag that

appeared like a bank bag with a zipper. MARSHALL then returned and handed UCA-SA-3233 \$1,030 in cash. UCA-SA-3233 then explained to MARSHALL that he knew a guy in Louisiana who owned a car lot and that the guy owed UCA-SA-3233 some money. UCA-SA-3233 explained he was going to get some catalytic converters from the Louisiana guy's car lot. MARSHALL laughed and explained that UCA-SA-3233 could get his/her money one way or the other. MARSHALL then explained that new catalytic converters are not worth much and if UCA-SA-3233 had any questions, to call MARSHALL. MARSHALL then explained that he was going to assume that everything UCA-SA-3233 brings to MARSHALL is off vehicles that UCA-SA-3233 bought. MARSHALL further stated that he does not discuss it, that he does not care, but he just does not ever want to discuss it. UCA-SA-3233 then explained that MARSHALL never needs to know where the catalytic converters come from.

42. Pursuant to Section 407.300, RSMo, purchasers of secondhand catalytic converters are required to keep a separate written or electronic record that contains, among other information, (1) a copy of the driver's license or photo identification issued by the state or by the United States government from the person whom the catalytic converter is obtained and (2) the current address, gender, birth date, and photograph of the person from whom the material is obtained if not included in the driver's license or United States government identification. Throughout the course of the investigation, investigators learned that MARSHALL was not complying with Section 407.300, RSMo, as a legitimate purchaser of catalytic converters would. Further, MARSHALL did not ask UCA-SA-3233 to provide his/her driver's license or United States government identification and UCA-SA-3233 did not provide MARSHALL with any form of identification. Finally, MARSHALL did not ask for, and UCA-SA-3233 did not provide MARSHALL, his/her current address or date of birth.

43. On October 8, 2021, members of SPD and the United States Drug Enforcement Administration (DEA) attempted to sell MARSHALL three catalytic converters utilizing CS4. At approximately 10:15 a.m., SPD Sergeant Casey Wilkerson met with CS4. CS4 was checked for any hidden contraband and money. None were found. CS4 was provided three catalytic converters that were marked for identification purposes. CS4 was also provided a recording device. Agents then followed CS4 directly to the TARGET LOCATION. At approximately 10:45 a.m., CS4 arrived at TARGET LOCATION. CS4 met with a subject named Aaron LNU. Aaron LNU advised that MARSHALL was not at home. Aaron LNU instructed CS4 to text MARSHALL and inquire when MARSHALL would be returning. At approximately 10:55 a.m., CS4 departed the location and met with investigators. CS4 then attempted to contact MARSHALL via text and voicemail. At approximately 11:34 a.m., CS4 sent MARSHALL a picture of the three catalytic converters to MARSHALL. MARSHALL never returned the messages back to CS4. At approximately 12:00 p.m., the undercover operation was terminated. At approximately 2:43 p.m. MARSHALL returned the text message and stated that he would pay "\$160 on the torp and \$70 on the Nissan". The text message was not returned.

44. On October 12, 2021, investigators met with CS4 to complete the transaction that was started on October 8, 2021. At approximately 7:05 p.m., Det. Rankey and Sgt. Wilkerson met with CS4. CS4 was checked for any hidden contraband and none was found. CS4 was provided the same three catalytic converters and a recording device. The investigators then followed the CS directly to the TARGET LOCATION where the CS sold MARSHALL the three catalytic converters for \$310. However, the CS owed MARSHALL \$200 from a previous debt and received only \$110.

45. MARSHALL also engaged the CS in conversation. During part of that conversation, MARSHALL discussed the need to collect ID's, photographs, and issue receipts, at which time CS4 stated "let's face it, uh, there's still going to be people that's bringing shady ones out, and they'll show you their ID, they don't give a fuck." MARSHALL responded as follows:

Well, that's fine! [unintelligible] Totally fine. I'll fucking still buy them. As long as they don't say property of fucking U-Haul on them [unintelligible] you know what I mean? I'll buy the motherfuckers, I don't care. But, I'm, as long as I'm in compliance with the law and they think they know that I'm on the healthy side of things, then, you know, I'm good. But, if they, if I'm out here fucking buying shit 'willie-nillie" giving people cash, not getting any receipts or anything, they're going to think, oh, this guys out here buying stolen shit, not helping the situation,...and they're gonna want to make an example of me. I buy a lot of fucking cats. Everyone who buys cats around here sells them to me,...and they know that. I say 'they' I mean Feds,...I mean the Feds, fucking Springfield,...I've told them. I've told Springfield PD [unintelligible]. Springfield's [unintelligible] shit. Springfield Police doesn't do a fucking thing. I've tried to work with them, I've tried to help them. You know, and they, [unintelligible] they don't give a fuck. I don't know. I don't know if they just don't give a fuck or if they have bigger fish to fry, or what. But I've talked with detectives and shit like this and I've been like 'hey let me know what you guys got or someone you're looking at, you know, holler at me, whatever, I'll keep an eye out for them, I'll [unintelligible] the information I know on them', and they've never call me."

46. The conversation between MARSHALL and CS4 continued as follows:

CS4: Are they keeping you informed, and, and, kind of, are they...how are they coming down the line? I mean, is it an actual law that's in the...

MARSHALL: Yes. It's been a law. It's been a law. We just haven't been following the laws correctly and I'm just finding that out now.

CS4: Oh

MARSHALL: So, I'm just, I'm hearing things from my buyer, or, from my guy, my processor and everything, that, we need to be changing the way we do things and shit like that in order to be in compliance. And I ain't going to fucking Federal prison for this shit, I'll stop buying converters tomorrow...I'm not going to prison for this shit. It's...I like everyone I buy from, and I, you know, I've got a lot of guys that I buy from that will probably stop selling to me, I mean it is what it is, but...

CS4: Well, CYA [Cover Your Ass]

MARSHALL: Huh?

CS4: CYA [Cover Your Ass] [chuckling]

MARSHALL: [chuckling] Yeah, I hear ya, yeah, exactly, exactly.

47. CS4 then departed the TARGET LOCATION and was met by the investigators. CS4 provided the \$110 to investigators and was checked for any hidden contraband and none was found. The undercover meeting concluded at approximately 8:00 p.m.

D. TOLL ANALYSIS

48. In addition to interviews with known catalytic converter thieves, the investigation established, through toll analysis, numerous telephone contacts between MARSHALL and DAVIS and known catalytic converter thieves in the Springfield Metropolitan area. On May 25, 2021, UCA-SA-3233, obtained tolls for MARSHALL's and DAVIS's phone numbers. Included was a summary, which pinpointed calls made and received from MARSHALL's and DAVIS's phone numbers between March 17, 2021 and May 17, 2021. The summary revealed:

- **417-430-5828** (307 contacts): Associated with Brandon WALKER, 814 East Smith Street, Springfield, Missouri. From SPD resources, investigators determined that WALKER was heavily involved in criminal activity, including but not limited to narcotics, auto theft, and stealing. On March 31, 2021, WALKER, while operating a silver Nissan Altima, was contacted by an Officer Camryn Fite with the Republic, MO. Police Department. The officer searched WALKER's vehicle and located a backpack in the back seat of the vehicle. The backpack contained a hacksaw, which was painted and missing its serial number. Serial numbers were commonly etched onto such tools, or applied with a sticker or metal placard, which was not visible to Officer Fite. Additionally, a cut catalytic converter was located within the car.

- **417-307-4448** (226 contacts): Associated with Zachary B. WHITELEY, from SPD resources, investigators determined that WHITELEY was heavily involved in criminal activity, including but not limited to auto theft, narcotics, traffic pursuits, and burglary. On March 1, 2021, WHITELEY was arrested by the GCSO after he was found in possession of a stolen black Toyota pickup. During the arrest, WHITELEY's passenger fled on foot. During contact, WHITELEY claimed he had just purchased the vehicle. During a search of the vehicle, officers located a Milwaukee Sawzall and large pipe cutter. Additionally, six cut catalytic converters were located inside the vehicle.
- **417-379-7519** (218 contacts): Associated with Eric KALTENBACH, 3550 East Evergreen Street, Springfield, Missouri. From SPD resources, investigators determined that KALTENBACH was heavily involved in criminal activity, including but not limited to narcotics and stealing. KALTENBACH was arrested and charged for the theft of a catalytic converter, which took place on December 14, 2020.
- **417-630-2311** (211 contacts): Associated with Kimi WATSON, per SPD resources. WATSON's long-time boyfriend is Brandon BLAKEY. BLAKEY was arrested on April 23, 2021 and charged with six separate felony counts for stealing catalytic converters.
- **386-268-4659** (604 contacts): Associated with Michael WERNEKE, per SPD resources. WERNEKE has been identified as an employee of DAVIS and MARSHALL.

**E. MARSHALL TRANSPORTS AND SELLS CATALYTIC
CONVERTERS TO CAT DADDIES IN ARKANSAS**

49. In January 2021, agents received bank account intelligence that MARSHALL received money transfers from CAT DADDIES CORES LLC ("CAT DADDIES") on a weekly basis. SCRAP DADDIES METALS ("SCRAP DADDIES") is a scrap yard owned by CAT DADDIES. CAT DADDIES and SCRAP DADDIES are in Mountain Home, Arkansas and are owned by Joey ELLIS. The scrap yard is located at 2821 AR-5, Mountain Home, Arkansas.

50. Toll analysis for MARSHALL's and DAVIS's phone numbers between March 17, 2021 and May 17, 2021, revealed the following contacts with phones associated to CAT DADDIES:

- **870-476-1883** (293 contacts): Associated with CAT DADDIE'S CORES and Dustin WILLIE.
- **870-270-9522** (270 contacts): Associated with CAT DADDIE'S CORES and Joey ELLIS.

51. According to bank records, CAT DADDIES and SCRAP DADDIES utilize bank accounts with Anstaff Bank, 100 First National Avenue, Green Forest, Arkansas. Those accounts are numbers the last three numbers being ***068, ***100, and ***050.

52. MARSHALL holds two accounts at Citizen's Bank of Rogersville, 1001 West Center Street, Rogersville, Missouri, with account numbers with the last three digits being ***906 and ***950. The former account is associated with MARSHALL's business, A& E CORES. The latter account is associated with MARSHALL's business, MARSHALL'S AUTO SALES.

53. On September 11, 2019, MARSHALL opened Citizen's Bank of Rogersville account number with the last three digits being ***906. In December 2019, MARSHALL informed bank personnel that he had acquired a job with CAT DADDIES of Arkansas.

MARSHALL stated the CAT DADDIES buys catalytic converters off junk vehicles throughout the state of Missouri. MARSHALL stated that he would be receiving large wire transfers that MARSHALL would take out in cash. The first wire arrived December 10, 2019, for \$5,000. From December 10, 2019, through December 31, 2019, the wire transfers were no larger than \$5,000. After January 1, 2020, the wires began to get much larger, ranging up to \$41,500. Between December 2019 and February 2020, MARSHALL received approximately \$258,800 in wire transfers, utilizing this bank account.

54. Based upon bank intelligence, from January 2020 through August 2021, over \$6.8 million was deposited in MARSHALL's Citizen's Bank of Rogersville bank accounts. Approximately 95 % of the deposited funds originated as wired funds from CAT DADDIES Anstaff bank accounts. Further, from January 2020 through August 2021, MARSHALL withdrew \$6.6 million in cash from his Citizen's Bank of Rogersville Bank account. There were several transactions when MARSHALL withdrew over \$100,000.

55. Further, according to bank intelligence from December 2019 through July 2021, MARSHALL has transferred \$69,020 from his A&E CORES' account at Citizen's Bank of Rogersville to his MARSHALL'S AUTO SALES' account at Citizen's Bank of Rogersville.

F. SURVEILLANCE

56. As set forth above, the information obtained from known catalytic converter thieves, cell phone location warrants, surveillance of the TARGET LOCATION, and bank account intelligence, there is probable cause to believe that MARSHALL is using the TARGET LOCATION to buy and store stolen catalytic converters in connection with transporting stolen catalytic converters from the state of Missouri to the state of Arkansas for the purpose of selling

the stolen catalytic converters, in violation of 18 U.S.C. §§ 2314 and 371, interstate transportation of stolen goods and conspiracy to transport stolen goods interstate.

57. MARSHALL's statement to UCA-SA-3233 that he was preparing to ship off 1,000 catalytic converters is corroborated by video surveillance, as is discussed below. Further, video surveillance, banking intelligence, and cell phone location information obtained pursuant to previous cell phone location warrants demonstrate that MARSHALL is transporting a large volume of catalytic converters to Mountain Home, Arkansas and selling those catalytic converters to CAT DADDIES. To put the volume of catalytic converters Marshall is buying, transporting to Arkansas, and selling to CAT DADDIES into perspective, according to a database utilized by law enforcement, the four major scrap metal refineries in Springfield, Missouri purchased a combined total of 691 catalytic converters between May 1, 2021, and August 25, 2021.

58. On June 29, 2021, a surveillance camera was set up adjacent to the TARGET LOCATION.

59. Based upon surveillance footage, undercover surveillance, the location of MARSHALL's cell phone, and reports from victims there is probable cause to believe that MARSHALL is buying stolen catalytic converters. Below are instances of catalytic converter thefts, coupled with trips from the suspected thieves to the TARGET LOCATION, followed by the transportation of large amounts of catalytic converters from the TARGET LOCATION to CAT DADDIES.

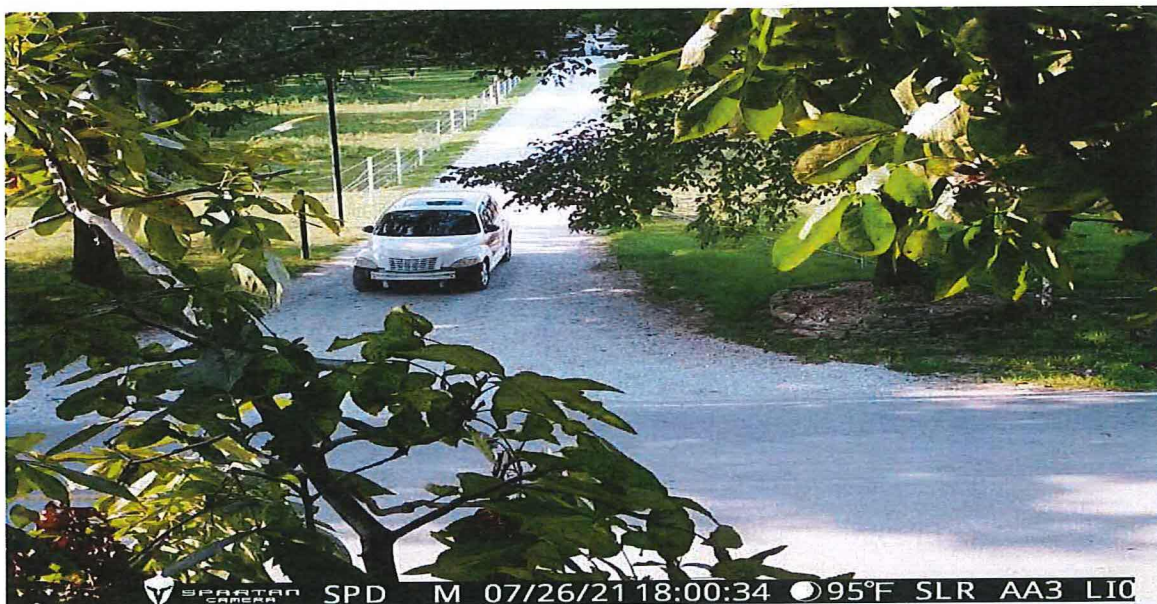
60. On July 27, 2021, Aaron Wilson filed a report with SPD stating that his 2001 Nissan Sentra had a catalytic converter stolen from the vehicle at 240 South Union Avenue, Springfield, Missouri. Wilson stated that a nearby surveillance camera had recorded an image of a white Chrysler PT Cruiser, with woodgrain panels and no front bumper, in the area at the time of the

theft. Wilson informed SPD that he had received a tip that the Chrysler was located nearby at 813 South Robberson Avenue., Springfield, Missouri. Wilson drove to 813 South Robberson Avenue, Springfield, Missouri and observed the Chrysler. Wilson walked up to the parked Chrysler and looked inside the vehicle. An unknown white female came out and confronted Wilson. Wilson asked the female if she knew about the theft of the catalytic converter. The female then stated that the Chrysler belonged to her boyfriend and then went back inside the apartment.

61. After speaking with Wilson, SPD responded to 813 South Robberson Avenue, Springfield, Missouri and observed the Chrysler. A registration check of the Chrysler indicated that it was registered to Christine Fowler in Ozark, Missouri. A check indicated that Fowler was deceased. The reporting officer observed a reciprocating saw blade and car jack inside the vehicle. Both items are commonly used to steal catalytic converters. No further action was taken at that time and the case was referred to SPD detectives for follow up.

62. On July 28, 2021, SPD detectives responded back to 813 South Robberson Avenue, Springfield, Missouri for follow up. The vehicle was unlocked, and the keys were still in the ignition. The vehicle was towed from the scene and an inventory was taken of the vehicle prior to towing. The reciprocating saw blade and jack were seized. A letter was found in the glove box dated May 25, 2021. The letter stated that Susanne Miller had given the vehicle to Demetric Johnson. The vehicle had previously belonged to Christine Fowler.

63. Upon reviewing the surveillance camera footage from the camera installed outside the TARGET LOCATION, on July 26, 2021 (the day of Wilson's catalytic converter theft), the Chrysler was observed entering the property at 5:31 p.m. and leaving at 6:00 p.m. See images below.



64. On July 30, 2021, Melissa Vasso reported that the catalytic converter on her 1998 Honda Accord had been stolen the previous day, July 29, 2021, while her vehicle was parked on the Burlington parking lot located at 3402 South Glenstone Avenue, Springfield, Missouri.

65. Closed Circuit Television (CCTV) footage of the criminal offense was ultimately obtained at which time a suspect vehicle was identified. The suspect vehicle was a black-colored

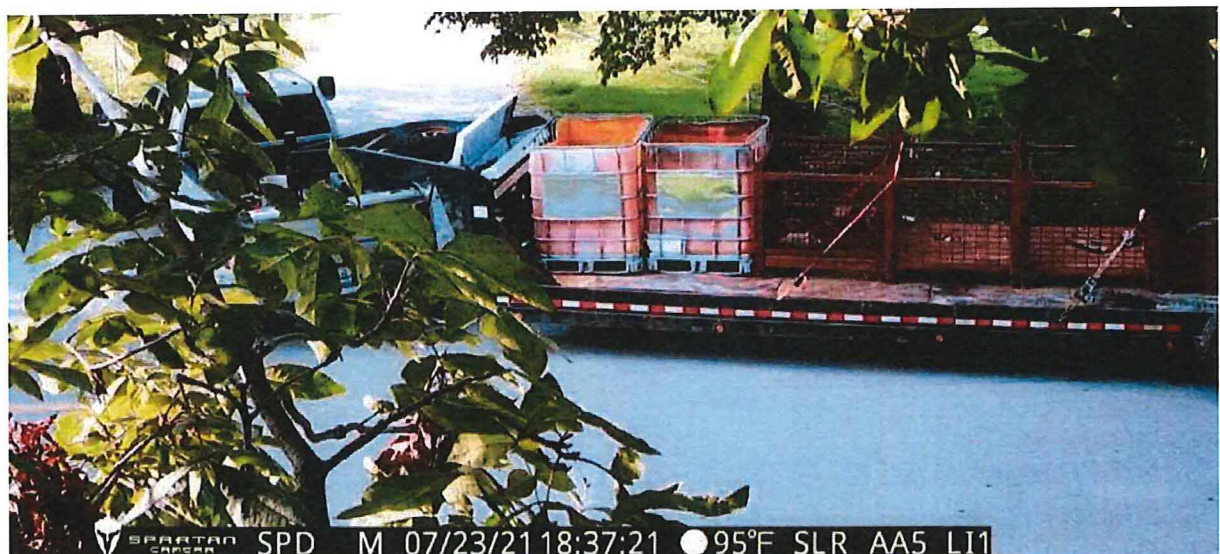
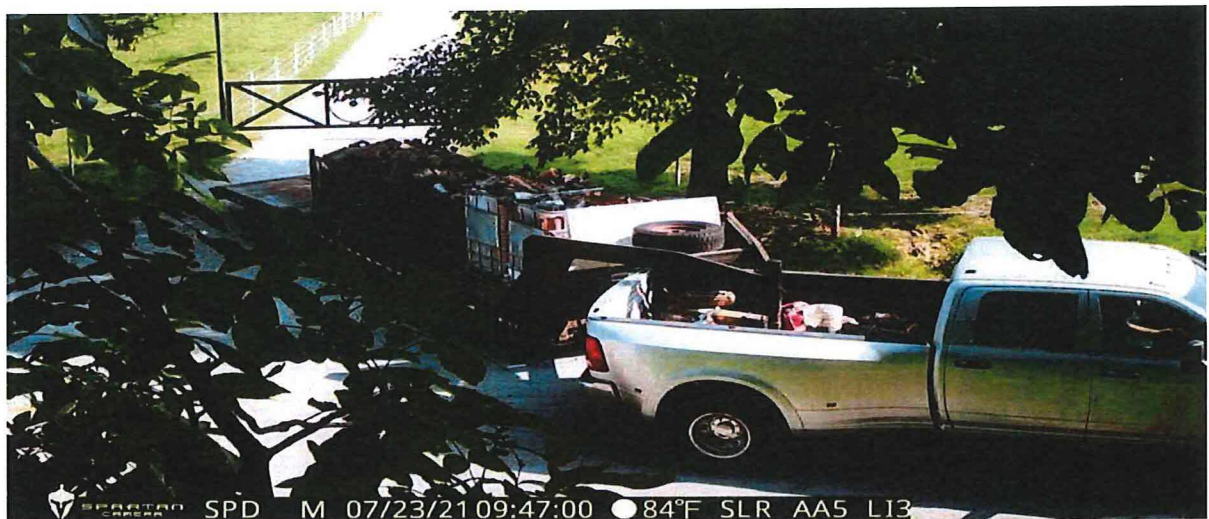
Chevrolet Avalanche, having dark tinted windows, five-spoke wheels, and a black bed cover. While viewing the surveillance camera photographs from August 13, 2021, SPD Det. Rankey observed vehicular traffic in and out of the TARGET LOCATION. Det. Rankey observed a black colored Chevrolet Avalanche enter the TARGET LOCATION at 10:02 p.m. Video surveillance showed the vehicle pulling up to the main shop and stopping. A subject then exited the passenger side door of the vehicle and walked toward the shop. Once the male walked to the shop, the vehicle backed up and parked nearby. A short time later, a subject emerged from the shop area and responded to the Chevrolet Avalanche, at which time the vehicle departed. Based on the surveillance footage and the short period of time the vehicle was at the location, it appeared that a transaction of some type likely occurred.

66. Upon comparing images of the Chevrolet Avalanche that entered the TARGET LOCATION on August 13, 2021, to the suspect vehicle involved in theft of Vasso's catalytic converter on July 29, 2021, no differences in the two vehicles could be detected. Although no license plate was captured during either incident, the vehicles appeared to be the exact same automobile. Given that MARSHALL was known to purchase stolen converters, along with it being unlikely that others were stealing catalytic converters while operating a similar, black-colored, Chevrolet Avalanche, it is reasonable to conclude that the Avalanche which was observed at the TARGET LOCATION on August 13, 2021, was the same vehicle involved in the theft of Vasso's catalytic converter on July 29, 2021.

67. In addition, agents surveilling the TARGET LOCATION, have seen trucks entering the property that appear to be carrying large loads of catalytic converters after daylight hours.

68. In addition to purchasing stolen catalytic converters, MARSHALL is transporting the catalytic converters from the TARGET LOCATION in Missouri, to Arkansas.

69. On July 23, 2021, at approximately 9:47 a.m., Det. Rankey observed via surveillance camera a silver Dodge Ram pick-up (Dodge) operated by MARSHALL leaving the TARGET LOCATION. Det. Rankey observed a trailer attached to the rear of the Dodge containing six metal crates containing items resembling catalytic converters. At approximately 6:37 p.m., the Dodge returned, and the six containers were empty, as observed in the images below.

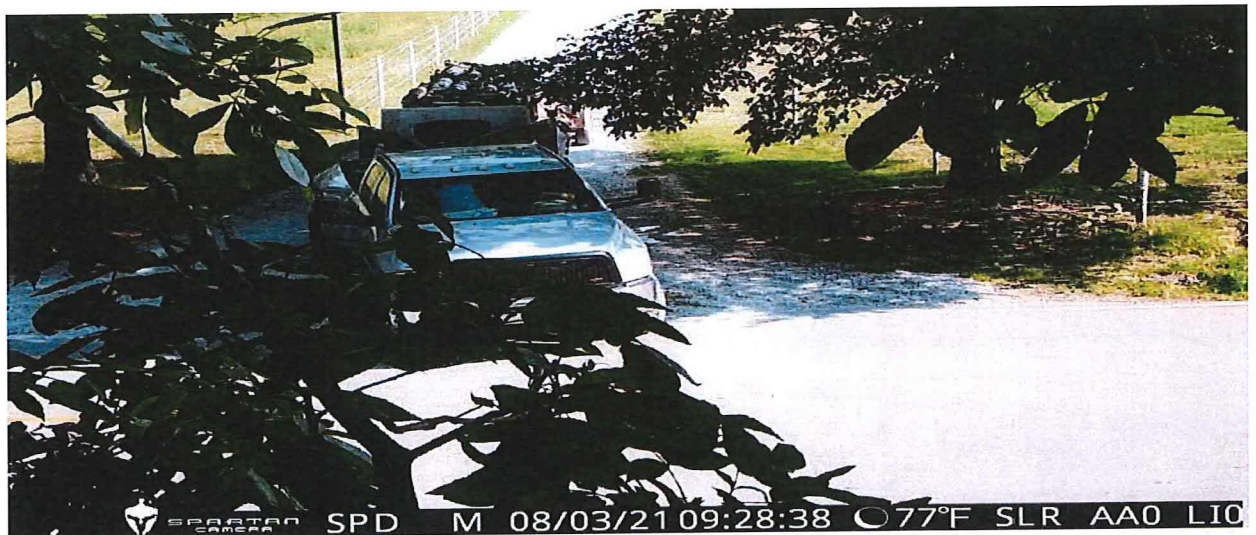


70. Also, on July 23, 2021, a warrant for location information for MARSHALL's cellular phone was obtained from this Court, in warrant number 21-SW-2118DPR, and was initiated on the same day by members of DEA-Springfield. The location was shared with Det.

Rankey. Det. Rankey determined that between 4:12 p.m. and 4:42 p.m. MARSHALL was at SCRAP DADDIES.

71. Per Google Maps, the one-way trip from SCRAP DADDIES to the TARGET LOCATION should have taken approximately 1 hour 52 minutes (approximately 102.1 miles). This was consistent with the times noted in the location coordinates provided.

72. On August 3, 2021, at approximately 9:28 a.m., Det. Rankey observed, via the surveillance camera, a silver Dodge Ram pick-up, operated by MARSHALL, leave the TARGET LOCATION. Det. Rankey observed a trailer attached to the rear of the Dodge containing six metal crates containing items resembling catalytic converters. At approximately 4:52 p.m., the Dodge returned, and the six containers were empty, as observed in the images below. Cell phone location information indicated that MARSHALL was at SCRAP DADDIES in Mountain Home, Arkansas until approximately 1:30 p.m.





73. MARSHALL's August 3, 2021, trip to Arkansas occurred eight days after the suspect in the theft of Nathan Wilson's 2001 Nissan Sentra catalytic converter was captured on the surveillance camera entering and exiting the TARGET LOCATION.

74. In addition to MARSHALL transporting suspected stolen catalytic converters to SCRAP DADDIES in Mountain Home, Arkansas, others have been seen entering MARSHALL's property with an empty trailer, departing with a full trailer of what appear to be catalytic converters, and then transporting the catalytic converters to SCRAP DADDIES in Arkansas.

75. On August 12, 2021, SPD investigators conducted surveillance on MARSHALL and others related to this ongoing investigation. At approximately 11:07 a.m., SPD Detective Josh Tucker observed a black Dodge Ram 3500, bearing Arkansas license plate 301ZEH, pulling a black gooseneck trailer bearing, Arkansas license plate 440461, arrive at the TARGET LOCATION. The driver of the Dodge, later identified by his Arkansas identification as Justin B. HUTCHESON, exited the truck and spent several minutes speaking to MARSHALL.

76. At approximately 11:40 a.m., SPD Corporal Neal McAmis observed HUTCHESON leave the TARGET LOCATION in the Dodge truck. SPD investigators maintained surveillance on HUTCHESON and Det. Tucker observed HUTCHESON pull into the parking lot of Apex Towing located at 7851 US-60, Rogersville, Missouri, at 11:46 a.m. Det. Tucker observed HUTCHESON remove a tire from the bed of his truck but then lost his view due to traffic.

77. At approximately 12:18 p.m., Det. Tucker observed HUTCHESON leave Apex Towing and followed HUTCHESON back to the TARGET LOCATION.

78. At approximately 12:26 p.m., Det. Tucker observed a male, believed to be MARSHALL, use a Caterpillar skid loader to load items resembling catalytic converters or other car parts into HUTCHESON's trailer.

79. At approximately 12:45 p.m., Det. Tucker observed HUTCHESON and his passenger, later identified as William B. WALKER leave the TARGET LOCATION. SPD investigators maintained surveillance of HUTCHESON until a traffic stop was conducted by Arkansas State Police Corporal Kevin Helm near Century Park Drive and AR-5 in Mountain Home, Arkansas, at approximately 2:33 p.m. HUTCHESON had been observed passing over the Missouri/Arkansas state line at 2:19 p.m.

80. At approximately 2:41 p.m., the traffic stop was completed, and SPD detectives continued surveillance of HUTCHESON. At approximately 2:42 p.m., SPD Sgt. Wilkerson observed HUTCHESON pull into the business located at 53 Canvasback Drive, Salesville, Arkansas. Sgt. Wilkerson then drove by again and observed HUTCHESON's vehicle backed into the building at the location and a male who appeared to be unloading the catalytic converters into the building.

81. At approximately 4:23 p.m., SPD Detective Cody Williams observed HUTCHESON leave the shop at 5 Canvasback Drive and drive south on AR-5. A few moments after that Det. Rankey observed HUTCHESON pull into SCRAP DADDIES.

82. On August 23, 2021, at approximately 9:18 a.m., Sgt. Wilkerson observed the black Dodge Ram pick-up, bearing Arkansas license plate 301ZEH, pulling a black gooseneck trailer, bearing Arkansas license plate 440461, arrive at the TARGET LOCATION, as reflected in the image below. This is the same vehicle and trailer that was observed on August 12, 2021, hauling items resembling catalytic converters.



83. At approximately 10:14 a.m., the vehicle departed the TARGET LOCATION with the trailer packed full of what appeared to be catalytic converters, as indicated in the image below.



84. Members of SPD followed the vehicle and trailer all the way into Arkansas and terminated surveillance on Arkansas Highway 5 near SCRAP DADDIES, Mountain Home, Arkansas. This trip occurred eight days after the suspect in the theft of Melissa Vasso's 1998 Honda Accord catalytic converter was captured on the surveillance camera entering and exiting the TARGET LOCATION.

85. Below is a chart that documents deposits into MARSHALL's Citizens Bank of Rogersville account from CAT DADDIES and corresponding interstate transportation of catalytic converters to CAT DADDIES from the TARGET LOCATION.

DATE	FUNDS FROM CAT DADDIES TO MARSHALL
7/1/2021	\$100,000
7/7/2021	\$100,000
7/8/2021	\$92,549
7/15/2021	\$24,940
7/15/2021	\$125,000
7/23/2021	MARSHALL TRANSPORTED A LOAD OF CATALYTIC CONVERTERS FROM TARGET LOCATION TO CAT DADDIES/SCRAP DADDIES
7/26/2021	\$78,128
7/26/2021	\$100,000

8/3/2021	MARSHALL TRANSPORTED A LOAD OF CATALYTIC CONVERTERS FROM TARGET LOCATION TO CAT DADDIES/SCRAP DADDIES
8/3/2021	\$180,849
8/12/2021	CATALYTIC CONVERTERS PICKED UP FROM TARGET LOCATION AND TRANSPORTED TO CAT DADDIES/SCRAP DADDIES
8/13/2021	\$100,000
8/13/2021	\$16,899
8/17/2021	\$100,000
8/23/2021	CATALYTIC CONVERTERS PICKED UP FROM TARGET LOCATION AND TRANSPORTED TO CAT DADDIES/SCRAP DADDIES
8/23/2021	\$30,000
8/24/2021	\$100,000
8/26/2021	\$91,357
9/07/2021	MARSHALL TRANSPORTED A LOAD OF CATALYTIC CONVERTERS FROM TARGET LOCATION TO CAT DADDIES/SCRAP DADDIES
9/8/2021	\$100,000
9/13/2021	\$40,583
9/14/2021	\$100,000
9/15/2021	\$51,598
9/23/2021	\$41,139
TOTAL:	\$1,473,042

86. Based upon my training and experience, I know that it is a common practice for business owners to keep records documenting finances, bank statements, ownership, membership, and custody of entities in which they have a financial interest. These records can be official records or documented in a ledger in the form of notes or other informal manner in both paper and electronic formats and are often stored on computers maintained by the business owner. These

documents are typically in secure locations within their residence, their vehicles, their business, their computers, or other locations over which they maintain dominion and control, for ready access and to conceal these items from law enforcement authorities. Records are commonly retained by individuals for multiple years for the purpose of reference in matters such as such as depreciation, amortization, depletion deduction, to figure the gain or loss when property is sold or otherwise disposed of. The Internal Revenue Service (IRS) recommends keeping tax documents for a period ranging from three years to an indefinite amount of time.

87. Based upon the banking intelligence, toll analysis, video surveillance, undercover surveillance, cell phone location information, statements from known catalytic converter thieves and confidential sources, investigators determined that MARSHALL regularly transported large loads of catalytic converters, some of which are stolen, from Rogersville, Missouri, to CAT DADDIES/SCRAP DADDIES in Mountain Home, Arkansas. Further, that MARSHALL receives large amounts of wire transfers from CAT DADDIES/SCRAP DADDIES as payment for the catalytic converters, including stolen catalytic converters.

88. In summary, MARSHALL created A&E CORES in December 2019. The creation of A&E CORES coincides with a precipitous uptick in stolen catalytic converters in the Springfield metropolitan area. SPD investigators have interviewed several known catalytic converter thieves who have identified MARSHALL as the primary purchaser of stolen catalytic converters in the Springfield metropolitan area. Confidential sources confirm that MARSHALL is knowingly purchasing stolen catalytic converters and further, that MARSHALL has a crew of catalytic converter thieves that he directs to steal catalytic converters and who supply him with stolen catalytic converters. MARSHALL purchased some of the stolen catalytic convertors at the TARGET LOCATION. MARSHALL stored the catalytic convertors he purchased, including

stolen catalytic convertors, at the TARGET LOCATION. Finally, MARSHALL transported, in bulk, the catalytic convertors he purchased, including the stolen catalytic convertors, from the TARGET LOCATION, to CAT DADDIES/SCRAP DADDIES located in Mountain Home, Arkansas.


89. Based on the aforementioned facts and circumstances, I submit that this affidavit supports probable cause for a search warrant authorizing the search of the TARGET LOCATION described in Attachment A to seek the items described in Attachment B. Your affiant respectfully submits that there is probable cause to believe that evidence of criminal offenses, namely, in violations of 18 U.S.C. § 2314 (interstate transportation of stolen property); 18 U.S.C. § 371 (conspiracy); 18 U.S.C. § 1956 (money laundering), 18 U.S.C. § 1956(h) (conspiracy to commit money laundering), and 18 U.S.C. § 1957 (engaging in monetary transactions in excess of \$10,000 in property derived from specific unlawful activity) is located at the TARGET LOCATION, and this evidence, listed in Attachment B to this affidavit, which is incorporated herein by reference, is evidence, contraband, the fruits of crime, or things otherwise criminally possessed, or property which is or has been used as the means of committing the foregoing offenses.

90. Your affiant, therefore, respectfully requests that the attached warrant be issued authorizing the search and seizure of the items listed in Attachment B.

Further your affiant sayeth naught.


Kelsey L. Cliffe
Special Agent, HSI

Subscribed to and sworn to before me in my presence via telephone on the 14th day of October 2021.


Honorable David P. Rush
Chief United States Magistrate Judge
Western District of Missouri